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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 ERNEST BOCK, L.L.C.,

11 Plaintiff,

12 vs.

13 Case No.: 2:19-cv-01065-JAD-EJY

14 PAUL STEELMAN, individually; MARYANN
15 STEELMAN, individually; PAUL STEELMAN,
as trustee of the Steelman Asset Protection Trust;
MARYANN STEELMAN, as trustee of the
16 Steelman Asset Protection Trust; JIM MAIN, as
trustee of the Steelman Asset Protection Trust;
STEPHEN STEELMAN; SUZANNE
17 STEELMAN-TAYLOR; PAUL STEELMAN as
trustee of the Paul C. Steelman and Maryann T.
Steelman Revocable Living Trust; MARYANN
18 STEELMAN, as trustee of the Paul C. Steelman
and Maryann T. Steelman Revocable Living Trust;
PAUL STEELMAN, as the trustee of the Paul
19 Steelman Gaming Asset Protection Trust;
KEEPSAKE, INC.; SMMR, LLC; SMMR, LLC,
20 SERIES A-Z; SSSS, LLC; SSSS, LLC, SERIES
B; CHRISTIANIA, LLC; CHRISTIANIA, LLC,
21 SERIES A-Z; COMPETITION INTERACTIVE,
LLC; PAUL STEELMAN, LTD.; STEELMAN
22 PARTNERS, LLP; PAUL STEELMAN DESIGN
GROUP, INC.; SAPT HOLDINGS, LLC, SERIES
B; AARON SQUIRES; and MATTHEW
23 MAHANEY,
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28 **JOINT STIPULATION AND ORDER TO
CONTINUE HEARING ON THE
SECOND MOTION TO DISMISS AARON
SQUIRES AND MATTHEW MAHANEY
UNDER FED. R. CIV. P. 12(b)(6)**

(*Second Request*)

Defendants.



1 Plaintiff Ernest Bock, L.L.C. (“Bock”), the Steelman Parties¹, the Corporate Defendants²,
 2 and the Attorney Defendants³ by and through their respective undersigned counsel, hereby submit
 3 this Second Joint Stipulation in accordance with LR IA 6-1 and LR 26-3. This is the second
 4 stipulation to adjourn the oral argument on the Second Motion to Dismiss Aaron Squires and
 5 Matthew Mahaney under Fed. R. Civ. P. 12(b)(6)⁴ (hereinafter, “Second Motion to Dismiss”) from
 6 the scheduled date of January 29, 2024⁵ to a date convenient for the Court between February 20,
 7 2024 and March 1, 2024. The Second Motion to Dismiss was filed on September 25, 2023⁶.

8 **a. Reasons for the Adjournment**

9 Counsel for Bock has logistical difficulties appearing for an in-person oral argument in
 10 Nevada on Monday, January 29, 2024. The Parties have agreed to a brief extension to
 11 accommodate Bock’s counsel and submit that good cause exists for the same. Counsel for Bock
 12 remains available for the currently scheduled date, but only by remote appearance. We understand
 13 the Court has directed in person and the Parties would prefer that, as well.

14 **b. Previous Extensions**

16 ¹ The “Steelman Parties” refer to Defendants Paul Steelman, individually; Maryann Steelman,
 17 individually; Paul Steelman, as trustee of the Steelman Asset Protection Trust (“SAPT”); Maryann
 18 Steelman, as trustee of the SAPT; Jim Main, as trustee of the SAPT; Stephen Steelman; Suzanne
 19 Steelman-Taylor; Paul Steelman, as trustee of the Paul C. Steelman and Maryann T. Steelman
 Revocable Living Trust (“RLT”); Maryann Steelman, as trustee of the RLT; and Paul Steelman,
 as trustee of the Paul Steelman Gaming Asset Protection Trust.

20 ² The “Corporate Defendants” refer to Christiania, LLC; Christiania, LLC, Series A-Z;
 21 Competition Interactive, LLC; Keepsake, Inc.; Paul Steelman Design Group, Inc.; Paul Steelman,
 Ltd.; SAPT Holdings, LLC, Series B; SMMR, LLC; SMMR, LLC, Series A-Z; SSSSS, LLC;
 SSSSS, LLC, Series, B; and Steelman Partners, LLP. Bock named SMMR, LLC, Series A-Z and
 Christiania, LLC, Series A-Z as defendants and contends that they consist of fifty-two (52)
 separate defendants (i.e., SMMR, LLC, Series A; SMMR, LLC, Series B; etc.). Defendants
 disagree. In the interest of brevity, those defendants have been stylized as “Series A-Z.”

23 ³ For purposes of this stipulation, the “Attorney Defendants” will refer to Aaron Squires; and
 Matthew Mahaney.

24 ⁴ ECF No. 245.

25 ⁵ ECF No. 254.

26 ⁶ ECF No. 245. This Second Motion to Dismiss is re-filed by the Attorney Defendants. The first
 27 Motion to Dismiss Aaron Squires and Matthew Mahaney under Fed. R. Civ. P. 12(b)(6) (the “First
 Motion”) was filed on July 23, 2021. See ECF No. 171. The Court stayed the case, including its
 28 ruling on the First Motion, on March 2, 2022. See ECF No. 235.



1 There has been one previous extensions of the scheduled oral argument date on the Second
2 Motion to Dismiss.

3 **c. Stipulation**

4 Bock, the Steelman Parties, the Corporate Defendants, and the Attorney Defendants,
5 hereby stipulate and agree, contingent upon this Court's approval, that:

- 6 1. The oral argument on the Second Motion to Dismiss that is currently scheduled for
7 January 29, 2024 at 3:00 p.m. in LV Courtroom 6D before Honorable Judge Jennifer
8 A. Dorsey be continued and reset to one of the following dates: February 20, 2024;
9 February 21, 2024; February 26, 2024; February 28, 2024; or a date and time
10 convenient thereafter for the Court.

11 Dated: January 25, 2024.

12 DATED: January 25, 2024.

13 **HANKIN, SANDMAN, PALLADINO,
WEINTROB & BELL, P.C.**

14
15 BY: /s/ John F. Palladino
16 JOHN F. PALLADINO, ESQ. (*pro hac vice*)
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19 *Pro-Hac Counsel for Plaintiff*

DATED: January 25, 2024.

**BROWNSTEIN HYATT FARBER
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Attorneys for the Steelman Parties

20
21 DATED: January 25, 2024

22 **BALLARD SPAHR, LLP**

23
24 BY: /s/ Joel E Tasca
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Attorney for Corporate Defendants

DATED: January 25, 2024

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ORDER

Based on the parties' stipulation [ECF No. 255], IT IS ORDERED that the oral argument on the Second Motion to Dismiss currently scheduled for January 29, 2024 is VACATED and CONTINUED TO February 26, 2024 at 2:30 pm.

UNITED STATES DISTRICT JUDGE
January 26, 2024

WEINBERG WHEELER
HUDGINS GUNN & DIAL